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8 UNITED STATES DISTRICT COURT  
9 SOUTHERN DISTRICT OF CALIFORNIA

11 ROBERT ALEXANDER KASEBERG,

12 Plaintiff,

13 v.

14 CONACO, LLC, TURNER  
15 BROADCASTING SYSTEM, TIME  
16 WARNER, INC., CONAN O'BRIEN,  
JEFF ROSS, MIKE SWEENEY; DOES  
1-50, inclusive,

17 Defendants.  
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CASE NO.: 3:15-CV-01637-JLS-DHB

Hon. David H. Bartick

**DECLARATION OF NICHOLAS  
HUSKINS IN SUPPORT OF  
DEFENDANTS' REPLY IN  
SUPPORT OF DEFENDANTS'  
MOTION FOR ENTRY OF A  
PROTECTIVE ORDER**

**DECLARATION OF NICHOLAS HUSKINS**

I, NICHOLAS HUSKINS, declare and state as follows:

1. I am an attorney at law duly licensed to practice before all courts of the State of California and am an Associate of the law firm of Glaser Weil Fink Howard Avchen & Shapiro LLP, attorneys of record herein for Defendants Conaco, LLC (“Conaco”); Turner Broadcasting System; Time Warner, Inc.; Conan O’Brien; Jeff Ross; and Mike Sweeney (collectively, “Defendants”). I make this declaration in support of Defendants’ Reply in Support of Defendants’ Motion for Entry of a Protective Order. The facts set forth herein are true of my own personal knowledge, and if called upon to testify thereto, I could and would competently do so under oath.

2. On June 22, 2016, I was present at the deposition of Mike Sweeney. During the deposition, the parties jointly sought the Court’s intervention after Mr. Sweeney objected to Plaintiff’s counsel’s questions concerning Mr. Sweeney’s salary information. The Court ordered no further questioning on the topic, and informed the parties that the Court was inclined to rule in favor of Defendants on the parties’ Joint Motion for Determination of Discovery Dispute, ECF No. 38, citing Plaintiff’s failure to establish a nexus between the financial information sought and the alleged infringement.

3. Attached as **Exhibit 1** are true and correct copies of relevant portions of: (a) Plaintiff’s Requests for Production of Documents and Things (Set One) to Defendant Jeff Ross; (b) Plaintiff’s Requests for Production of Documents and Things (Set One) to Defendant Time Warner Inc.; (c) Plaintiff’s Requests for Production of Documents and Things (Set One) to Defendant Turner Broadcasting System, Inc.; (d) Plaintiff’s Requests for Production of Documents and Things (Set Two) to Defendant Mike Sweeney; (e) Plaintiff’s Requests for Production of Documents and Things (Set Two) to Defendant Conan O’Brien; (f) Plaintiff’s

Glaser Weil

1 Requests for Production of Documents and Things (Set Two<sup>1</sup>) to Conaco, LLC; (g)  
 2 Plaintiff's Interrogatories to Defendant Conan O'Brien (Set Two); (h) Plaintiff's  
 3 Interrogatories to Defendant Jeff Ross (Set Two); (i) Plaintiff's Interrogatories to  
 4 Defendant Mike Sweeney (Set Two); (j) Plaintiff's Interrogatories to Defendant Time  
 5 Warner Inc. (Set Two); (k) Plaintiff's Interrogatories to Defendant Turner  
 6 Broadcasting System, Inc. (Set Two); and (l) Plaintiff's Interrogatories to Defendant  
 7 Conaco, LLC (Set Three). All of the discovery requests mentioned herein were  
 8 served on June 3, 2016.

9 4. Attached as **Exhibit 2** is a true and correct copy of Plaintiff's Expert  
 10 Witness Disclosures, served June 24, 2016.

11 I declare under penalty of perjury pursuant to the laws of the State of California  
 12 that the foregoing facts are true and correct.

13 Executed on June 30, 2016 at Los Angeles, California.



NICHOLAS HUSKINS

27 <sup>1</sup> Though titled (Set Two), this is actually the third set of RFPs served on Conaco,  
 28 LLC.

# Exhibit 1

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Attorney for Plaintiff  
ROBERT ALEXANDER KASEBERG

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

ROBERT ALEXANDER KASEBERG,

Plaintiffs,

vs.

CONACO, LLC; TURNER  
BROADCASTING SYSTEM; TIME  
WARNER, INC.; CONAN O'BRIEN;  
JEFF ROSS; MIKE SWEENEY; DOES 1  
– 10, inclusive,

Defendants.

Case No. 15-CV-01637-JLS-DHB

**PLAINTIFF'S REQUEST FOR  
PRODUCTION OF DOCUMENTS  
AND THINGS TO DEFENDANT JEFF  
ROSS (SET ONE)**

**PROPOUNDING PARTY:** PLAINTIFF ROBERT ALEXANDER KASEBERG

**RESPONDING PARTY:** DEFENDANT JEFF ROSS

**SET NO.:** ONE

**REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 1.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR annual gross revenue, salary or income related to the "CONAN" show in 2015.

**REQUEST FOR PRODUCTION NO. 2.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR annual net profits, salary or income related to the "CONAN" show in 2015.

**REQUEST FOR PRODUCTION NO. 3.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR gross revenues, salary or income related to the "CONAN" show that aired on January 14, 2015.

**REQUEST FOR PRODUCTION NO. 4.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR annual net profits, salary or income related to the "CONAN" show that aired on January 14, 2015.

**REQUEST FOR PRODUCTION NO. 5.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR gross revenues, salary or income related to the "CONAN" show that aired on February 4, 2015.

**REQUEST FOR PRODUCTION NO. 6.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR annual net profits, salary or income related to the "CONAN" show that aired on February 4, 2015.

**REQUEST FOR PRODUCTION NO. 7.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR gross revenues, salary or income related to the "CONAN" show that aired on February 17, 2015.

**REQUEST FOR PRODUCTION NO. 8.**

1 ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO  
2 YOUR annual net profits, salary or income related to the "CONAN" show that aired on  
3 February 17, 2015.

4 **REQUEST FOR PRODUCTION NO. 9.**

5 ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO  
6 YOUR gross revenues, salary or income related to the "CONAN" show that aired on  
7 June 9, 2015.

8 **REQUEST FOR PRODUCTION NO. 10.**

9 ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO  
10 YOUR annual net profits, salary or income related to the "CONAN" show that aired on  
11 June 9, 2015.

12  
13 Dated: June 3, 2016

By: /jlorenzo/  
JAYSON M. LORENZO  
Attorney for PLAINTIFF

Jayson M. Lorenzo, Esq. SBN 216973  
Attorney at Law  
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Fax (760) 520-7900

Attorney for Plaintiff  
ROBERT ALEXANDER KASEBERG

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

ROBERT ALEXANDER KASEBERG,

Plaintiff,

vs.

CONACO, LLC; TURNER  
BROADCASTING SYSTEM; TIME  
WARNER, INC.; CONAN O'BRIEN;  
JEFF ROSS; MIKE SWEENEY; DOES 1  
– 10, inclusive,

Defendants.

Case No. 15-CV-01637-JLS-DHB

**PLAINTIFF'S REQUEST FOR  
PRODUCTION OF DOCUMENTS  
AND THINGS TO DEFENDANT  
TIME WARNER, INC. (SET ONE)**

**PROPOUNDING PARTY:** PLAINTIFF ROBERT ALEXANDER KASEBERG

**RESPONDING PARTY:** DEFENDANT TIME WARNER INC.

**SET NO.:** ONE



**REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 1.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR annual gross revenues related to the "CONAN" show in 2015.

**REQUEST FOR PRODUCTION NO. 2.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR annual net profits related to the "CONAN" show in 2015.

**REQUEST FOR PRODUCTION NO. 3.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR gross revenues related to the "CONAN" show that aired on January 14, 2015.

**REQUEST FOR PRODUCTION NO. 4.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR annual net profits related to the "CONAN" show that aired on January 14, 2015.

**REQUEST FOR PRODUCTION NO. 5.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR gross revenues related to the "CONAN" show that aired on February 4, 2015.

**REQUEST FOR PRODUCTION NO. 6.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR annual net profits related to the "CONAN" show that aired on February 4, 2015.

**REQUEST FOR PRODUCTION NO. 7.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR gross revenues related to the "CONAN" show that aired on February 17, 2015.

**REQUEST FOR PRODUCTION NO. 8.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR annual net profits related to the "CONAN" show that aired on February 17, 2015.

**REQUEST FOR PRODUCTION NO. 9.**

1 ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO  
2 YOUR gross revenues related to the "CONAN" show that aired on June 9, 2015.

3 **REQUEST FOR PRODUCTION NO. 10.**

4 ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO  
5 YOUR annual net profits related to the "CONAN" show that aired on June 9, 2015.

6  
7  
8 Dated: June 3, 2016

By: /jlorenzo/  
JAYSON M. LORENZO  
Attorney for PLAINTIFF

Jayson M. Lorenzo, Esq. SBN 216973  
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Fax (760) 520-7900

Attorney for Plaintiff  
ROBERT ALEXANDER KASEBERG

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

ROBERT ALEXANDER KASEBERG,

Plaintiff,

vs.

CONACO, LLC; TURNER  
BROADCASTING SYSTEM; TIME  
WARNER, INC.; CONAN O'BRIEN;  
JEFF ROSS; MIKE SWEENEY; DOES 1  
– 10, inclusive,

Defendants.

Case No. 15-CV-01637-JLS-DHB

**PLAINTIFF'S REQUEST FOR  
PRODUCTION OF DOCUMENTS  
AND THINGS TO DEFENDANT  
TURNER BROADCASTING SYSTEM  
(SET ONE)**

**PROPOUNDING PARTY:** PLAINTIFF ROBERT ALEXANDER KASEBERG

**RESPONDING PARTY:** DEFENDANT TURNER BROADCASTING  
SYSTEM

**SET NO.:** ONE

**REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 1.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR annual gross revenues related to the "CONAN" show in 2015.

**REQUEST FOR PRODUCTION NO. 2.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR annual net profits related to the "CONAN" show in 2015.

**REQUEST FOR PRODUCTION NO. 3.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR gross revenues related to the "CONAN" show that aired on January 14, 2015.

**REQUEST FOR PRODUCTION NO. 4.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR annual net profits related to the "CONAN" show that aired on January 14, 2015.

**REQUEST FOR PRODUCTION NO. 5.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR gross revenues related to the "CONAN" show that aired on February 4, 2015.

**REQUEST FOR PRODUCTION NO. 6.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR annual net profits related to the "CONAN" show that aired on February 4, 2015.

**REQUEST FOR PRODUCTION NO. 7.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR gross revenues related to the "CONAN" show that aired on February 17, 2015.

**REQUEST FOR PRODUCTION NO. 8.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR annual net profits related to the "CONAN" show that aired on February 17, 2015.

**REQUEST FOR PRODUCTION NO. 9.**

1 ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO  
2 YOUR gross revenues related to the "CONAN" show that aired on June 9, 2015.

3 **REQUEST FOR PRODUCTION NO. 10.**

4 ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO  
5 YOUR annual net profits related to the "CONAN" show that aired on June 9, 2015.

6  
7 Dated: June 3, 2016

By: /jlorenzo/  
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Attorney for PLAINTIFF

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Attorney for Plaintiff  
ROBERT ALEXANDER KASEBERG

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

ROBERT ALEXANDER KASEBERG,

Plaintiff,

vs.

CONACO, LLC; TURNER  
BROADCASTING SYSTEM; TIME  
WARNER, INC.; CONAN O'BRIEN;  
JEFF ROSS; MIKE SWEENEY; DOES 1  
– 10, inclusive,

Defendants.

Case No. 15-CV-01637-JLS-DHB

**PLAINTIFF'S REQUEST FOR  
PRODUCTION OF DOCUMENTS  
AND THINGS TO DEFENDANT  
MIKE SWEENEY (SET TWO)**

**PROPOUNDING PARTY:** PLAINTIFF ROBERT ALEXANDER KASEBERG

**RESPONDING PARTY:** DEFENDANT MIKE SWEENEY

**SET NO.:** TWO

**REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 29.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR annual gross revenue, salary or income related to the "CONAN" show in 2015.

**REQUEST FOR PRODUCTION NO. 30.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR annual net profits, salary or income related to the "CONAN" show in 2015.

**REQUEST FOR PRODUCTION NO. 31.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR gross revenues, salary or income related to the "CONAN" show that aired on January 14, 2015.

**REQUEST FOR PRODUCTION NO. 32.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR annual net profits, salary or income related to the "CONAN" show that aired on January 14, 2015.

**REQUEST FOR PRODUCTION NO. 33.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR gross revenues, salary or income related to the "CONAN" show that aired on February 4, 2015.

**REQUEST FOR PRODUCTION NO. 34.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR annual net profits, salary or income related to the "CONAN" show that aired on February 4, 2015.

**REQUEST FOR PRODUCTION NO. 35.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR gross revenues, salary or income related to the "CONAN" show that aired on February 17, 2015.

**REQUEST FOR PRODUCTION NO. 36.**

1 ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO  
2 YOUR annual net profits, salary or income related to the "CONAN" show that aired on  
3 February 17, 2015.

4 **REQUEST FOR PRODUCTION NO. 37.**

5 ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO  
6 YOUR gross revenues, salary or income related to the "CONAN" show that aired on  
7 June 9, 2015.

8 **REQUEST FOR PRODUCTION NO. 38.**

9 ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO  
10 YOUR annual net profits, salary or income related to the "CONAN" show that aired on  
11 June 9, 2015.

12  
13  
14 Dated: June 3, 2016

By: /jlorenzo/  
JAYSON M. LORENZO  
Attorney for PLAINTIFF



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Attorney for Plaintiff  
ROBERT ALEXANDER KASEBERG

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

ROBERT ALEXANDER KASEBERG,

Plaintiffs,

vs.

CONACO, LLC; TURNER  
BROADCASTING SYSTEM; TIME  
WARNER, INC.; CONAN O'BRIEN;  
JEFF ROSS; MIKE SWEENEY; DOES 1  
– 10, inclusive,

Defendants.

Case No. 15-CV-01637-JLS-DHB

**PLAINTIFF'S REQUEST FOR  
PRODUCTION OF DOCUMENTS  
AND THINGS TO DEFENDANT  
CONAN O'BRIEN (SET TWO)**

**PROPOUNDING PARTY:** PLAINTIFF ROBERT ALEXANDER KASEBERG

**RESPONDING PARTY:** DEFENDANT CONAN O'BRIEN

**SET NO.:** TWO

**REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 28.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR annual gross revenue, salary or income related to the "CONAN" show in 2015.

**REQUEST FOR PRODUCTION NO. 29.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR annual net profits, salary or income related to the "CONAN" show in 2015.

**REQUEST FOR PRODUCTION NO. 30.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR gross revenues, salary or income related to the "CONAN" show that aired on January 14, 2015.

**REQUEST FOR PRODUCTION NO. 31.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR annual net profits, salary or income related to the "CONAN" show that aired on January 14, 2015.

**REQUEST FOR PRODUCTION NO. 32.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR gross revenues, salary or income related to the "CONAN" show that aired on February 4, 2015.

**REQUEST FOR PRODUCTION NO. 33.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR annual net profits, salary or income related to the "CONAN" show that aired on February 4, 2015.

**REQUEST FOR PRODUCTION NO. 34.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR gross revenues, salary or income related to the "CONAN" show that aired on February 17, 2015.

**REQUEST FOR PRODUCTION NO. 35.**

1 ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO  
2 YOUR annual net profits, salary or income related to the "CONAN" show that aired on  
3 February 17, 2015.

4 **REQUEST FOR PRODUCTION NO. 36.**

5 ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO  
6 YOUR gross revenues, salary or income related to the "CONAN" show that aired on  
7 June 9, 2015.

8 **REQUEST FOR PRODUCTION NO. 37.**

9 ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO  
10 YOUR annual net profits, salary or income related to the "CONAN" show that aired on  
11 June 9, 2015.

12  
13 Dated: June 3, 2016

By: /jlorenzo/  
JAYSON M. LORENZO  
Attorney for PLAINTIFF

Jayson M. Lorenzo, Esq. SBN 216973  
Attorney at Law  
2794 Gateway Road  
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Attorney for Plaintiff  
ROBERT ALEXANDER KASEBERG

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

ROBERT ALEXANDER KASEBERG,

Plaintiff,

vs.

CONACO, LLC; TURNER  
BROADCASTING SYSTEM; TIME  
WARNER, INC.; CONAN O'BRIEN;  
JEFF ROSS; MIKE SWEENEY; DOES 1  
– 10, inclusive,

Defendants.

Case No. 15-CV-01637-JLS-DHB

**PLAINTIFF'S REQUEST FOR  
PRODUCTION OF DOCUMENTS  
AND THINGS TO DEFENDANT  
CONACO, LLC (SET TWO)**

**PROPOUNDING PARTY:** PLAINTIFF ROBERT ALEXANDER KASEBERG

**RESPONDING PARTY:** DEFENDANT CONACO, LLC

**SET NO.:** TWO

**REQUESTS FOR PRODUCTION**

**DOCUMENT REQUEST NO. 73:**

Please produce all internal COMMUNICATIONS within CONACO, LLC, including any communications between any writer, staff or Defendant in this action, related to JOKE #5.

**DOCUMENT REQUEST NO. 74:**

Please produce all internal COMMUNICATIONS within CONACO, LLC, including any communications between any writer, staff or Defendant in this action, related to JOKE #6.

**DOCUMENT REQUEST NO. 75:**

Please produce all internal COMMUNICATIONS within CONACO, LLC, including any communications between any writer, staff or Defendant in this action, related to JOKE #7.

**DOCUMENT REQUEST NO. 76:**

Please produce all internal COMMUNICATIONS within CONACO, LLC, including any communications between any writer, staff or Defendant in this action, related to JOKE #8.

**REQUEST FOR PRODUCTION NO. 77.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR annual gross revenues related to the "CONAN" show in 2015.

**REQUEST FOR PRODUCTION NO. 78.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR annual net profits related to the "CONAN" show in 2015.

**REQUEST FOR PRODUCTION NO. 79.**

ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO YOUR gross revenues related to the "CONAN" show that aired on January 14, 2015.

**REQUEST FOR PRODUCTION NO. 80.**

1 ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO  
2 YOUR annual net profits related to the "CONAN" show that aired on January 14, 2015.

3 **REQUEST FOR PRODUCTION NO. 81.**

4 ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO  
5 YOUR gross revenues related to the "CONAN" show that aired on February 4, 2015.

6 **REQUEST FOR PRODUCTION NO. 82.**

7 ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO  
8 YOUR annual net profits related to the "CONAN" show that aired on February 4, 2015.

9 **REQUEST FOR PRODUCTION NO. 83.**

10 ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO  
11 YOUR gross revenues related to the "CONAN" show that aired on February 17, 2015.

12 **REQUEST FOR PRODUCTION NO. 84.**

13 ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO  
14 YOUR annual net profits related to the "CONAN" show that aired on February 17,  
15 2015.

16 **REQUEST FOR PRODUCTION NO. 85.**

17 ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO  
18 YOUR gross revenues related to the "CONAN" show that aired on June 9, 2015.

19 **REQUEST FOR PRODUCTION NO. 86.**

20 ANY and ALL DOCUMENTS, tangible things and other items that RELATE TO  
21 YOUR annual net profits related to the "CONAN" show that aired on June 9, 2015.

22 **REQUEST FOR PRODUCTION NO. 87.**

23 Any and all emails, from JOSH COMERS regarding any and all jokes MR.  
24 COMERS submitted to you for use on the "CONAN" show monologue between  
25 November 1, 2015 and June 9, 2015.

26 **REQUEST FOR PRODUCTION NO. 88.**

1 Any and all emails, from BRIAN KILY regarding any and all jokes MR. KILY  
2 submitted to you for use on the "CONAN" show monologue between November 1, 2015  
3 and June 9, 2015.

4 **REQUEST FOR PRODUCTION NO. 89.**

5 Any and all emails, from ROB KUTNER regarding any and all jokes MR.  
6 KUTNER submitted to you for use on the "CONAN" show monologue between  
7 November 1, 2015 and June 9, 2015.

8  
9  
10 Dated: June 3, 2016

By: /jlorenzo/  
JAYSON M. LORENZO  
Attorney for PLAINTIFF

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

Case No. 15-CV-01637-JLS-DHB

VS.

**PLAINTIFFS INTERROGATORIES TO  
DEFENDANT CONAN O'BRIEN ( SET  
TWO)**

Defendant.

**SET NO.:** TWO

PLAINTIFF ROBERT ALEXANDER KASEBERG (“PLAINTIFF”) propound the following Interrogatories on DEFENDANT CONAN O’BRIEN (“DEFENDANT”). PLAINTIFF



1 M. Whenever used herein, "and" is to be understood to mean "or," and vice versa,  
2 whenever such construction results in a broader request for information.

3 **INTERROGATORIES**

4 **INTERROGATORY NO. 4.**

5 Identify YOUR annual gross revenue, salary or income related to the "CONAN" show in 2015.

6 **INTERROGATORY NO. 5.**

7 Identify YOUR annual net profits, salary or income related to the "CONAN" show in 2015.

8 **INTERROGATORY NO. 6.**

9 Identify YOUR gross revenues, salary or income related to the "CONAN" show that aired on  
10 January 14, 2015.

11 **INTERROGATORY NO. 7.**

12 Identify YOUR annual net profits, salary or income related to the "CONAN" show that aired on  
13 January 14, 2015.

14 **INTERROGATORY NO. 8.**

15 Identify YOUR gross revenues, salary or income related to the "CONAN" show that aired on  
16 February 4, 2015.

17 **INTERROGATORY NO. 9.**

18 Identify YOUR annual net profits, salary or income related to the "CONAN" show that aired on  
19 February 4, 2015.

20 **INTERROGATORY NO. 10.**

21 Identify YOUR gross revenues, salary or income related to the "CONAN" show that aired on  
22 February 17, 2015.

23 **INTERROGATORY NO. 11.**

24 Identify YOUR annual net profits, salary or income related to the "CONAN" show that aired on  
25 February 17, 2015.

26 **INTERROGATORY NO. 12.**

27 Identify YOUR gross revenues, salary or income related to the "CONAN" show that aired on  
28 June 9, 2015.

**INTERROGATORY NO. 13.**

Identify YOUR annual net profits, salary or income related to the "CONAN" show that aired on June 9, 2015.

Dated: June 3, 2016

By: /jlorenzo/  
JAYSON M. LORENZO  
Attorney for PLAINTIFF

Jayson M. Lorenzo, Esq. SBN 216973  
Attorney at Law  
2794 Gateway Road  
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Tel. (760) 517-6646  
Fax (760) 520-7900

Attorney for Plaintiff  
ROBERT ALEXANDER KASEBERG

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

ROBERT ALEXANDER KASEBERG,

Plaintiff,

vs.

JEFF ROSS,

Defendant.

Case No. 15-CV-01637-JLS-DHB

**PLAINTIFFS INTERROGATORIES TO  
DEFENDANT JEFF ROSS (SET TWO)**

**PROPOUNDING PARTY:** PLAINTIFF ROBERT ALEXANDER KASEBERG

**RESPONDING PARTY:** DEFENDANT JEFF ROSS

**SET NO.:** TWO

PLAINTIFF ROBERT ALEXANDER KASEBERG ("PLAINTIFF") propound the following Interrogatories on DEFENDANT JEFF ROSS ("DEFENDANT"). PLAINTIFF requests that the responding party respond in writing, and under oath, to the following interrogatories within 30 days of the service of these requests.

**INTERROGATORIES**

**INTERROGATORY NO. 4.**

Identify YOUR annual gross revenue, salary or income related to the "CONAN" show in 2015.

**INTERROGATORY NO. 5.**

Identify YOUR annual net profits, salary or income related to the "CONAN" show in 2015.

**INTERROGATORY NO. 6.**

Identify YOUR gross revenues, salary or income related to the "CONAN" show that aired on January 14, 2015.

**INTERROGATORY NO. 7.**

Identify YOUR annual net profits, salary or income related to the "CONAN" show that aired on January 14, 2015.

**INTERROGATORY NO. 8.**

Identify YOUR gross revenues, salary or income related to the "CONAN" show that aired on February 4, 2015.

**INTERROGATORY NO. 9.**

Identify YOUR annual net profits, salary or income related to the "CONAN" show that aired on February 4, 2015.

**INTERROGATORY NO. 10.**

Identify YOUR gross revenues, salary or income related to the "CONAN" show that aired on February 17, 2015.

**INTERROGATORY NO. 11.**

Identify YOUR annual net profits, salary or income related to the "CONAN" show that aired on February 17, 2015.

**INTERROGATORY NO. 12.**

Identify YOUR gross revenues, salary or income related to the "CONAN" show that aired on June 9, 2015.

**INTERROGATORY NO. 13.**

1 Identify YOUR annual net profits, salary or income related to the "CONAN" show that aired on  
2 June 9, 2015.

3  
4 Dated: June 3, 2016

By: /jlorenzo/  
JAYSON M. LORENZO  
Attorney for PLAINTIFF

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

Defendant.

PLAINTIFF ROBERT ALEXANDER KASEBERG (“PLAINTIFF”) propound the following Interrogatories on DEFENDANT MIKE SWEENEY (“DEFENDANT”). PLAINTIFF

1 M. Whenever used herein, "and" is to be understood to mean "or," and vice versa,  
2 whenever such construction results in a broader request for information.

3 **INTERROGATORIES**

4 **INTERROGATORY NO. 4.**

5 Identify YOUR annual gross revenue, salary or income related to the "CONAN" show in 2015.

6 **INTERROGATORY NO. 5.**

7 Identify YOUR annual net profits, salary or income related to the "CONAN" show in 2015.

8 **INTERROGATORY NO. 6.**

9 Identify YOUR gross revenues, salary or income related to the "CONAN" show that aired on  
10 January 14, 2015.

11 **INTERROGATORY NO. 7.**

12 Identify YOUR annual net profits, salary or income related to the "CONAN" show that aired on  
13 January 14, 2015.

14 **INTERROGATORY NO. 8.**

15 Identify YOUR gross revenues, salary or income related to the "CONAN" show that aired on  
16 February 4, 2015.

17 **INTERROGATORY NO. 9.**

18 Identify YOUR annual net profits, salary or income related to the "CONAN" show that aired on  
19 February 4, 2015.

20 **INTERROGATORY NO. 10.**

21 Identify YOUR gross revenues, salary or income related to the "CONAN" show that aired on  
22 February 17, 2015.

23 **INTERROGATORY NO. 11.**

24 Identify YOUR annual net profits, salary or income related to the "CONAN" show that aired on  
25 February 17, 2015.

26 **INTERROGATORY NO. 12.**

27 Identify YOUR gross revenues, salary or income related to the "CONAN" show that aired on  
28 June 9, 2015.

**INTERROGATORY NO. 13.**

Identify YOUR annual net profits, salary or income related to the "CONAN" show that aired on June 9, 2015.

Dated: June 3, 2016

By: /jlorenzo/  
JAYSON M. LORENZO  
Attorney for PLAINTIFF



**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

Defendant.

PLAINTIFF ROBERT ALEXANDER KASEBERG (“PLAINTIFF”) propound the following Interrogatories on DEFENDANT TIME WARNER, INC. (“DEFENDANT”).

1 M. Whenever used herein, "and" is to be understood to mean "or," and vice versa,  
2 whenever such construction results in a broader request for information.

3 **INTERROGATORIES**

4 **INTERROGATORY NO. 4.**

5 Identify YOUR annual gross revenues related to the "CONAN" show in 2015.

6 **INTERROGATORY NO. 5.**

7 Identify YOUR annual net profits related to the "CONAN" show in 2015.

8 **INTERROGATORY NO. 6.**

9 Identify YOUR gross revenues related to the "CONAN" show that aired on January 14, 2015.

10 **INTERROGATORY NO. 7.**

11 Identify YOUR annual net profits related to the "CONAN" show that aired on January 14,  
12 2015.

13 **INTERROGATORY NO. 8.**

14 Identify YOUR gross revenues related to the "CONAN" show that aired on February 4, 2015.

15 **INTERROGATORY NO. 9.**

16 Identify YOUR annual net profits related to the "CONAN" show that aired on February 4,  
17 2015.

18 **INTERROGATORY NO. 10.**

19 Identify YOUR gross revenues related to the "CONAN" show that aired on February 17, 2015.

20 **INTERROGATORY NO. 11**

21 Identify YOUR annual net profits related to the "CONAN" show that aired on February 17,  
22 2015.

23 **INTERROGATORY NO. 12.**

24 Identify YOUR gross revenues related to the "CONAN" show that aired on June 9, 2015.

25 ///

26 /

27 /

28 /

**INTERROGATORY NO. 13.**

Identify YOUR annual net profits related to the "CONAN" show that aired on June 9, 2015.

Dated: June 3, 2016

By: /jlorenzo/  
JAYSON M. LORENZO  
Attorney for PLAINTIFF



1 M. Whenever used herein, "and" is to be understood to mean "or," and vice versa,  
2 whenever such construction results in a broader request for information.

3  
4 **INTERROGATORIES**

5 **INTERROGATORY NO. 4.**

6 Identify YOUR annual gross revenues related to the "CONAN" show in 2015.

7 **INTERROGATORY NO. 5.**

8 Identify YOUR annual net profits related to the "CONAN" show in 2015.

9 **INTERROGATORY NO. 6.**

10 Identify YOUR gross revenues related to the "CONAN" show that aired on January 14, 2015.

11 **INTERROGATORY NO. 7.**

12 Identify YOUR annual net profits related to the "CONAN" show that aired on January 14,  
13 2015.

14 **INTERROGATORY NO. 8.**

15 Identify YOUR gross revenues related to the "CONAN" show that aired on February 4, 2015.

16 **INTERROGATORY NO. 9.**

17 Identify YOUR annual net profits related to the "CONAN" show that aired on February 4,  
18 2015.

19 **INTERROGATORY NO. 10.**

20 Identify YOUR gross revenues related to the "CONAN" show that aired on February 17, 2015.

21 **INTERROGATORY NO. 11.**

22 Identify YOUR annual net profits related to the "CONAN" show that aired on February 17,  
23 2015.

24 **INTERROGATORY NO. 12.**

25 Identify YOUR gross revenues related to the "CONAN" show that aired on June 9, 2015.

26 **INTERROGATORY NO. 13.**

27 Identify YOUR annual net profits related to the "CONAN" show that aired on June 9, 2015.

Dated: June 3, 2016

By: /jlorenzo/  
JAYSON M. LORENZO  
Attorney for PLAINTIFF

Jayson M. Lorenzo, Esq. SBN 216973  
Attorney at Law  
2794 Gateway Road  
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Tel. (760) 517-6646  
Fax (760) 520-7900

Attorney for Plaintiff  
ROBERT ALEXANDER KASEBERG

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

ROBERT ALEXANDER KASEBERG,

Plaintiff,

vs.

CONACO, LLC; TURNER  
BROADCASTING SYSTEM; TIME  
WARNER, INC.; CONAN O'BRIEN;  
JEFF ROSS; MIKE SWEENEY; DOES 1  
– 10, inclusive,

Defendant.

Case No. 15-CV-01637-JLS-DHB

**PLAINTIFF'S INTERROGATORIES  
TO DEFENDANT CONACO, LLC  
(SET THREE)**

**PROPOUNDING PARTY:** PLAINTIFF ROBERT ALEXANDER KASEBERG

**RESPONDING PARTY:** DEFENDANT CONACO, LLC

**SET NO.:** THREE

1 **INTERROGATORY NO. 33:**

2 Please IDENTIFY YOUR annual gross revenues in 2015 related to the "CONAN"  
3 show.

4 **INTERROGATORY NO. 34:**

5 Please IDENTIFY YOUR annual net profits in 2015 related to the "CONAN" show.

6  
7 Dated: June 3, 2016

By: /jlorenzo/  
JAYSON M. LORENZO  
Attorney for PLAINTIFF



# Exhibit 2

Jayson M. Lorenzo, Esq. SBN 216973  
Attorney at Law  
2794 Gateway Road  
Carlsbad, CA 92009  
Tel. (760) 517-6646  
Fax (760) 520-7900

Attorney for Plaintiff  
ROBERT ALEXANDER KASEBERG

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

ROBERT ALEXANDER KASEBERG,

Plaintiff,

vs.

CONACO, LLC; TURNER  
BROADCASTING SYSTEM; TIME  
WARNER, INC.; CONAN O'BRIEN;  
JEFF ROSS; MIKE SWEENEY; DOES 1  
– 10, inclusive,

Defendants.

Case No. 15-CV-01637-JLS-DHB

**PLAINTIFF'S EXPERT WITNESS  
DISCLOSURE**

Plaintiff, ROBERT ALEXANDER KASEBERG, by and through his counsel,  
Jayson M. Lorenzo, hereby submits this Expert Witness Disclosure per the Court's  
Scheduling Order (Docket No. 29) and state as follows:

Each of the experts disclosed herein are expected to testify as to their expected areas of expertise with subject matter of one not redundant to the other. Plaintiff designate the following retained expert witnesses to testify on his behalf:

1. Elayne Boosler, 11061 Wrightwood Lane, Studio City, CA 91604 213-509-1606. \$500.00 an hour for deposition and trial testimony.

2. John H. Reith, MBA, CPA, CFF, CVA, CMA, CIA, 924 South Oakland Avenue, Pasadena, California 91106-3727 626-440-1820. \$330.00 an hour for deposition and trial testimony.

3. David Barksy, Ph.D. CSU San Marcos, 333 S. Twin Oaks Valley San Marcos, CA 92096 760-750-3064. \$275.00 an hour for deposition and trial testimony.

4. Patrick Eckstrom, My SMN Digital Marketing Services; 1501 India Street, Ste 103-230, San Diego, CA 92101. \$375.00 an hour for deposition and trial testimony.

**Retained Expert Witness No. 1: Elayne Boosler**

Ms. Boosler is a professional comedy writer.

As discovery is still ongoing and depending on evidence and facts presented at trial, Ms. Boosler is expected to offer her expertise in comedic writing related to but not limited to the following:

- a. Access to the jokes at issue;
- b. The proliferation of joke stealing in the industry;
- c. Similarity of the jokes at issue;
- d. Customs, practices and standards in the comedy industry;

**Retained Expert Witness No. 2: Mr. John Reith**

Mr. Reith is a CPA.

As discovery is still ongoing and depending on evidence and facts presented at trial, Mr. Reith is expected to offer his expertise in relate to profits and revenues related to use of the infringing material including but not limited to the following:

1 a. Revenue of the Defendants attributed to use of the infringing material  
2 related to a segment or portion of a television show and the basis and methodology for  
3 his calculation;

4 b. Revenue of Defendants attributed to use of the infringing material related  
5 to a segment or portion of a television show in multiple broadcastings and the basis and  
6 methodology for his calculation;

7 d. Revenue of Defendants attributed to use of the infringing material related  
8 to a segment or portion of a television show in syndicated broadcasting and the basis  
9 and methodology for his calculation;

10 e. Profits of Defendants attributed to use of the infringing material related to a  
11 segment or portion of a television show and the basis and methodology for his  
12 calculation;

13 f. Profits of Defendants attributed to use of the infringing material related to a  
14 segment or portion of a television show in multiple broadcastings and the basis and  
15 methodology for his calculation;

16 g. Profits of Defendants attributed to use of the infringing material related to a  
17 segment or portion of a television show in syndicated broadcasting;

18 **Retained Expert Witness No. 3: David Barsky:**

19 Mr. Barsky has a Ph.D. in Mathematics.

20 As discovery is still ongoing and depending on evidence and facts presented at  
21 trial, Mr. Barsky is expected to offer his expertise related to math and probability  
22 analysis including but not limited to the following:

23 a. A probabilistic analysis of the same jokes of Plaintiff appearing on the  
24 "Conan" show and the basis and methodology for his analysis.

25 **Retained Expert Witness No. 4: Patrick Ekstrom:**

26 Mr. Eckstrom has extensive knowledge, training and experience in marketing.  
27 Specifically, Mr. Eckstrom focuses on social media and internet marketing.  
28

1 As discovery is still ongoing and depending on evidence and facts presented at  
2 trial, Mr. Eckstrom is expected to offer his expertise related to social media including  
3 but not limited to the following:

4 a. Navigation and utility of Twitter.com, including but not limited to the  
5 navigation and utility of "following", "followers", "likes", and "lists";

6 b. Access of information on Twitter.com including but not limited to access  
7 as it relates to "following", "followers", "likes", and "lists";

8 c. Navigation and utility of blogs;

9 d. Access of information of blogs.

10 Plaintiff reserves the right to rely on the testimony of any of the Defendants'  
11 expert witnesses.

12 **NON-RETAINED WITNESSES**

13 While the percipient witnesses involved in the action are not offered by Plaintiff  
14 at this time as "expert witnesses," in an exercise of caution and to avoid the possibility  
15 of later preclusion of their testimony, to the extent that those involved in action and/or  
16 other aspects of the claim may be argued to have a specialized skill, experience,  
17 training, knowledge, etc., Plaintiff anticipates that the following persons may also  
18 provide testimony concerning the similarity of the jokes, access to jokes, the customs  
19 and practices related to the comedy industry, revenue or profits of Defendants attributed  
20 to use of the infringing material related to a segment or portion of a television show,  
21 navigation, utility, access to social media such as twitter, blogs and or the internet.

22 These witnesses include:

23 a. Conan O'Brien

24 b. Mike Sweeney

25 c. Jeff Ross

26 d. Brian Kiley

27 e. Rob Kutner

28 f. Josh Comers

1 g. Alex Kaseberg

2 h. Person Most Knowledgeable of Conaco, LLC related to financial  
3 information

4 i. Person Most Knowledgeable of Time Warner, Inc. related to financial  
5 information

6 j. Person Most Knowledgeable of Turner Broadcasting System related to  
7 financial information

8 Plaintiff reserves the right to amend and supplement this expert witness disclosure  
9 at a later date.

10  
11 Dated: June 24, 2016

By: /s/ jayson m. lorenzo  
JAYSON M. LORENZO  
Attorney for PLAINTIFF